

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

LATOYA DAVIS,)	
)	
Plaintiff,)	CA NO. 6:06-1468-RBH-WMC
)	
vs.)	DEFENDANT’S ANSWERS TO
)	RULE 26.01 INTERROGATORIES
NHC HEALTH CARE, a corporation)	
)	
Defendant.)	
)	

Defendant NHC HealthCare/Clinton, LLC (incorrectly identified as “NHC Healthcare”), by and through its undersigned counsel, hereby answers Federal Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Answer: None.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

Answer: Plaintiff has requested, and is entitled, to have her claims be tried to a jury.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each

publicly-owned company in which the party owns ten percent or more of the outstanding shares.

Answer: Defendant NHC HealthCare/Clinton, LLC, is a wholly-owned subsidiary of NHC HealthCare Corporation. Defendant does not own ten percent or more of the outstanding shares of any publicly-owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

Answer: Plaintiff alleges that all acts alleged in the Complaint occurred in the Greenville Division and that she resides therein. NHC HealthCare/Clinton, LLC, is located in the Greenville Division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason should entail substantial duplication of labor if heard by different judges.

Answer: Upon information and belief, this action is not related to any other matter filed in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: Defendant should have been identified as NHC HealthCare/Clinton, LLC.

An amended summons and pleading is not required.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Answer: At this time, NHC HealthCare/Clinton, LLC, does not contend that some other person or legal entity is liable in this matter. As the parties engage in discovery and additional facts become known, NHC HealthCare/Clinton, LLC, reserves the right to amend its response.

Date: August 2, 2006

Respectfully Submitted,

/s/ Cara Y. Crotty

Cara Y. Crotty, FED I.D. #6869

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(continued on following page)

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